

ORIGINAL

BEFORE THE

## Federal Communications Commission

WASHINGTON, D.C.

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JUL 19 1993FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 Preparation for International )  
 Telecommunication Union World )  
 Radiocommunication Conferences )

ET Docket No. 93-198

COMMENTS OF THE  
NATIONAL ASSOCIATION OF SHORTWAVE BROADCASTERS

The National Association of Shortwave Broadcasters (NASB), by its attorneys, hereby submits its initial Comments in the above-captioned proceeding. These Comments are submitted pursuant to the FCC's Notice of Inquiry ("Notice"), FCC 93-328 (adopted June 24, 1993 and released June 28, 1993). The Notice is part of the Commission's preparations for the 1993 International Telecommunication Union (ITU) World Radiocommunication Conference (WRC-93).

I. STATEMENT OF INTEREST

1. NASB is a non-profit corporation, organized to advance the stature of FCC-licenses shortwave broadcasters, to improve business and operating conditions for shortwave broadcasters, and to monitor and recommend national and international legislation, regulations and policies that affect or may affect NASB's members. Eligibility for voting membership in NASB is limited to licensees and permittees in the international broadcast service. NASB's current members are listed in Attachment A.

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## II. BACKGROUND

2. NASB participated actively in the preparation for WARC-92. Its president was a member of the FCC's Industry Advisory Committee and later served as a member of the United States delegation at WARC-92. Other association members participated as members of an Informal Working Group (IWG) which submitted its recommendations to the FCC's Industry Advisory Committee (IAC).

## III. DISCUSSION

3. High Frequency Broadcasting Planning. The Association believes it is urgent for the ITU to reconsider the feasibility of planning in High Frequency Broadcasting and that an appropriate agenda item should be included in the 1995 World Radiocommunication Conference.

The position of the United States at the World Administrative Radio Conference (WARC-92) was that insufficient frequencies have been allocated to HF Broadcasting, thus rendering further work on planning unproductive. Yet, a substantial number of newly allocated frequencies -- although still inadequate in number -- have been tied to a planning procedure still to be identified. The United States has already stated its view that an inadequate allocation has been granted to this service. Therefore, consistent with the U.S. position, it is appropriate to seek a remedy at the earliest possible opportunity. The Association believes such a remedy or alternative may be developing which should be considered at the earliest possible WRC.

There is a growing experience with an informal procedure known as the High Frequency Coordination Conference (HFCC) which provides a forum for broadcasters themselves to coordinate the best use of allocated frequencies. Early experience with the procedure is encouraging. It may well be that the HFCC, or some version of it, will be an alternative to planning as advocated by some proponents. If so, then it should be evaluated, formalized and accepted (to the extent appropriate) at the earliest possible date. To delay doing so will merely prolong confusion and encourage disharmony among member states.

The Association endorses an early evaluation of the procedure for another reason, one related solely to the United States jurisdiction. In the U.S., in recent years, the coordination process and associated costs have been very unsatisfactory. This is the direct result of the FCC's decision, for budgetary reasons, to cease sending staff members to the regular HF frequency-coordination conferences. Without an FCC presence at such meetings, American HF broadcasters -- who must pay frequency-coordination fees -- do not get the advocacy services for which they have paid. The broadcasters must then pay additional fees to file amended frequency-hour requests in response to the failure to obtain coordination for their original proposals. In this respect, the Association must take strong exception to the statement, in paragraph 18 of the Notice of Inquiry that, "Parties should note that historically the needs of U.S. H.F. broadcasters have been met satisfactorily through the existing Article 17 coordination procedures...."

The Association therefore reiterates its strongly held view that the absence of direct representation by the FCC on behalf of private international broadcasters at coordination conferences jeopardizes the legitimate interests of the United States, imposes unfair and unjustified fees on private international broadcasters and potentially denies to the international listening audience examples of the value of privately funded free speech espoused by the United States of America. The deficiencies in the existing situation also mandate that, if a new and different coordination regime can be developed, it is extremely timely to do so and at the same time to reexamine the role of the FCC in the coordination process.

HF broadcasting has been and continues to be a vital part of global international communication. The role it plays and will play for the foreseeable future must be part of the overall consideration of developing technologies.

The Association also submits for the record, as Attachments B and C, its Comments and Reply Comments, respectively, in response to last year's Notice of Inquiry from NTIA.

#### IV. CONCLUSION

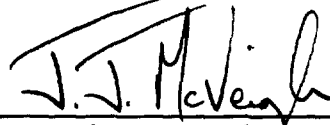
The National Association of Shortwave Broadcasters urges the FCC to make findings consistent with the views submitted here, and later, in Reply Comments. Specifically, the Association

urges that an item concerning High Frequency Broadcasting Planning be placed on the agenda for WRC-95.

Respectfully submitted,

NATIONAL ASSOCIATION OF  
SHORTWAVE BROADCASTERS

By



John Joseph McVeigh

Its Attorney

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Dated: July 19, 1993

**ATTACHMENT A**

**NATIONAL ASSOCIATION OF SHORTWAVE BROADCASTERS, Inc.**  
**Membership list**

**Adventist World Radio (Tulio R. Haylock)**  
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**Revised 8/31/92**

**ATTACHMENT B**

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BY HAND DELIVERY

RE: NTIA Docket No. 920532-2132

BEFORE THE  
DEPARTMENT OF COMMERCE  
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION

In the Matter of	)	
Current and Future Requirements	)	
for the Use of Radio Frequencies	)	Docket No. 920532-2132
in the United States	)	

COMMENTS OF THE  
NATIONAL ASSOCIATION OF SHORTWAVE BROADCASTERS

The National Association of Shortwave Broadcasters (NASB), by its attorneys, hereby submits its initial Comments in the above-captioned proceeding. NASB submits these Comments pursuant to the NTIA's Notice of Inquiry (Notice) dated June 1, 1992. The Notice is part of an investigation of future requirements for radio frequency spectrum. Additionally, the Notice seeks Comments on issues related to International Telecommunication Union radio conferences.

I. STATEMENT OF INTEREST

1. NASB is a non-profit corporation, organized to advance the stature of FCC-licensed shortwave broadcasters, to improve business and operating conditions for shortwave broadcasters, and to monitor and recommend national and international legislation, regulations and policies that affect or may affect NASB's

members. Eligibility for voting membership in NASB is limited to licensees and permittees in the international broadcast service. Attachment A lists NASB's current membership.

## II. BACKGROUND

2. NASB participated actively in the preparations for WARC-92. Its president was a member of the FCC's Industry Advisory Committee (IAC) and later served as a member of the United States delegation at WARC-92. Other association members participated as members of an Informal Working Group (IWG) which submitted its recommendations to the FCC's IAC. The IAC, in turn, incorporated the recommendations in its report to the FCC. HF users in the fixed and mobile services participated in the IWG. The recommendations which emerged attempted to take into account the legitimate concerns of all participants. Although that document was prepared for and submitted to the FCC, it represents the association's views regarding many of the issues raised in the current Notice. A copy of the document is Attachment B.

## III. DISCUSSION

3. Future Spectrum Requirements for High Frequency Broadcasting. Despite the development of additional delivery systems, it is the Association's judgment that there will continue to be a long term shortfall of allocated frequencies for HF Broadcasting. The number of shortwave receivers in the hands of

the global public is in excess of 600 million, and listener surveys point to numerically large audiences. In certain regions of the world, HF broadcasting is an especially important source of information. For example, at this writing, there is consideration of a U.S. Government expanded HF service to Asia. Thus, the Association believes that future spectrum planning for the United States should include sufficient additional spectrum for shortwave broadcasting. Specifically, there is a need for additional spectrum below 13,600 kHz. Although WARC-92 did allocate an additional 350 kHz in these bands, the allocation actually made was considerably short of the 1,755 kHz recommended by the FCC's IAC. The Association suggests that the IAC report be used as a basis for future planning by the U.S. Further, an NTIA study, "Spectrum Required for HF Broadcasting, TR90-268," independently supports the conclusions of the IAC report.

4. DAB in HF. The Association reaffirms its interest in the possible use of DAB in HF. The Association continues to follow and encourage further research and consideration of in-band DAB in HF.

5. Single Side Band. The Association affirms that Single Side Band (SSB) offers, in theory, advantages to spectrum management. However, it is crucial to the continued viability of the medium that the audience not be arbitrarily reduced through premature adoption of SSB until a substantial number of SSB capable receivers are in place. The Association believes that

the U.S. position at WARC-92 favoring an early adoption of SSB was inappropriate. The lack of support at WARC-92 to the U.S. position underscores that both broadcasters and many developing countries do not favor increased reliance on SSB. The Association believes that it is likely that other technologies, e.g. DAB in HF, will leapfrog SSB.

6. Preparation for and Participation in International Radio Conferences. The Association applauds, in principle, the proce-

representatives were free, and in fact did, attend the meetings of the IAC.

7. Although a more aggressive position on the part of the U.S. may not have substantially altered the outcome at WARC-92, it may have tilted the final results toward increased spectrum allocation.

8. Strategic Long-Range National Planning and Spectrum Reform. While the Association encourages efforts to simplify and improve spectrum management, it is concerned that a market based



Association requests that the NTIA and all other Governmental agencies involved in national or international frequency-coordination efforts to give due weight to the interests of the Association's members in all such coordination activities.

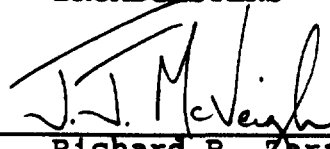
#### IV. CONCLUSION

The National Association of Shortwave Broadcasters urges NTIA to make findings consistent with the views submitted here. Specifically, the Association urges that future spectrum planning include sufficient additional allocations for the present and future HF Broadcasting service.

Respectfully submitted,

NATIONAL ASSOCIATION OF SHORTWAVE  
BROADCASTERS

By

  
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Date: November 6, 1992

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**Revised 8/31/92**

**ATTACHMENT B**

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MEMORANDUM

TO: IWG-1 Mailing List

FROM: Leonard R. Raish *LRR*  
(Chairman, IWG-1)

SUBJECT: Final Report of IWG-1 to the FCC Industry Advisory  
Committee (IAC) on U.S. Preparations for WARC-92

DATE: April 24, 1991

The attached Final Report was forwarded to Mr. Frank Urbany, Co-Chairman of the IAC earlier today. As I see it, this completes the work of IWG-1.

While stated already at the last meeting of IWG-1 on March 26th, I reiterate my pleasure for having had the opportunity to work with each of you in making what I feel is a substantive contribution to the U.S. preparatory effort for WARC-92.

Thanks for all the fine support and help.

LRR:cej  
Attachment - 1

**FINAL REPORT**  
**OF**  
**INFORMAL WORKING GROUP -- NUMBER ONE**

**SUBMITTED TO:**  
**INDUSTRY ADVISORY COMMITTEE**  
**April 24, 1991**



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